

UNITED STATES BANKRUPTCY COURT

FOR THE

**EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In the Matter of:

RENE GUILLERMO LOPEZ

AND

SANDRA MACIOROSKI LOPEZ
Debtors

Chapter 13
18-14082-BFK

**TRUSTEE’S OPPOSITION TO MOTION FOR AUTHORITY TO MODIFY
EXISTING LIEN**

Thomas P. Gorman, Trustee, notes his objection to the Motion for Authority to Modify Existing Lien for PNC Bank, National Association. Movant lacks standing to bring this Motion under Local Rule 6004-4, and the Motion itself does not comply with Local Rule 6004-4(B)(4) in that it does not provide an “apple to apples” comparison of the monthly mortgage payment before and after the proposed modification, and does not (and cannot) state whether Debtors intend to modify their compromised Plan in light of the apparent savings being achieved. Wherefore, Trustee prays that the Motion be denied.

January 15, 2021
Dated

/s/ Thomas P. Gorman
Thomas P. Gorman
Chapter 13 Trustee
300 N. Washington Street, #400
Alexandria, VA 22314
(703) 836-2226
VSB #26421

CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of January, 2021 mailed a true copy of the foregoing Response to the following parties.

Rene Guillermo Lopez
Sandra Macioroski Lopez
Chapter 13 Debtor
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/s/ Thomas P. Gorman
Thomas P. Gorman